

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

| | | |
|-----------------------------|---|------------------------|
| IN RE: CORY R. ALLEN | : | CHAPTER 13 |
| Debtor(s) | : | |
| | : | |
| CHARLES J. DEHART, III | : | |
| STANDING CHAPTER 13 TRUSTEE | : | |
| | : | |
| vs. | : | |
| | : | |
| CORY R. ALLEN | : | |
| Respondent(s) | : | CASE NO. 1-16-bk-00430 |

TRUSTEE'S OBJECTION TO SECOND AMENDED CHAPTER 13 PLAN

AND NOW, this 14th day of September, 2016, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Debtor(s)' plan violates 11 U.S.C. Sec. 1322(a)(1) in that the debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required. More specifically,

2. Trustee avers that debtor(s)' plan is not feasible and cannot be administered due to the lack of the following:

- a. 2015 Federal Income Tax return. (Second request)
- b. Amended 2016(b) Statement discussing attorney fees as set forth in plan. (Second request)

3. The Trustee avers that debtor(s)' plan is not feasible based upon the following:

- a. Plan ambiguous – payment. Plan payments significantly exceed base plan.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.

- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/James K. Jones
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 14th day of September, 2016, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Jon Adelstein, Esquire
275 South Main Street, Suite 9
Doylestown, PA 18901

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee